

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

STRATEGIC DELIVERY SOLUTIONS, LLC,  Plaintiff,  v.  STALLION EXPRESS, LLC, TIMOTHY KRAVITZ, CHRISTOPHER SAHADI, JANE DOE(S) 1-3, and JOHN DOE(S) 1-3.  Defendants.	<b>Case No. 2:18-cv-08779-MCA-SCM</b>
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**TEMPORARY RESTRAINING ORDER AND ~~SCHEDULING~~  
ORDER REGARDING PRELIMINARY INJUNCTIVE  
RELIEF, PURSUANT TO RULE 65 OF THE FEDERAL  
RULES OF CIVIL PROCEDURE AND LOCAL CIVIL RULE 65.1**

THIS MATTER having been brought before the Court by OlenderFeldman LLP, counsel for Plaintiff Strategic Delivery Solutions, LLC (“SDS” or “Plaintiff”), seeking relief by way of temporary restraints and preliminary injunctive relief, pursuant to Rule 65 of the Federal Rules of Civil Procedure (“Rule” or the “Rules”), Local Civil Rule 65.1, and the Federal Defend Trade Secrets Act, New Jersey Trade Secrets Act, the Federal Computer Fraud and Abuse Act, the New Jersey Compute Crimes Act, and the common law of the State of New Jersey, based upon the facts set forth in the Verified Complaint dated May 3, 2018; and the Defendants Stallion Express, LLC, Timothy Kravitz (“Kravitz”), Christopher Sahadi (“Sahadi”), Jane Does(s) 1-3, and John Doe(s) 1-3 (the “Stallion Defendants”) having been given notice of this Order to Show Cause by electronic mail and hand delivery of a copy of the Verified Complaint, Order to Show Cause and accompanying Memorandum of Law, on May 3, 2018, advising the Stallion Defendants of Plaintiff’s intent to seek the relief set forth therein,

and the Stallion Defendants having consented to the entry of Temporary Restraints as set forth herein, with further agreement between the Parties on a discovery schedule in advance of the hearing on Preliminary Injunctive Relief, and the Court having determined that good cause has been shown for the relief set forth herein,

IT IS on this 2 day of May, 2018, **ORDERED** that the Stallion Defendants are hereby immediately restrained and prohibited, directly or indirectly, from the following (the "Temporary Restraints"), until further order of the Court:

1. Possessing, using or disclosing SDS's trade secrets and other proprietary and confidential information and for them to return all of the same; and
2. Further developing or customizing Stallion's software systems, utilizing such information, and further barring Kravitz and Sahadi from any further work or development on behalf of Stallion with respect to use, development or implementation of such information.

And **IT IS FURTHER ORDERED** that the Court shall hold a hearing on SDS's request for Preliminary Injunctive relief on the \_\_\_\_\_ day of August, 2018 (the "Hearing"), in advance of which the following shall occur:

1. SDS shall provide the Stallion Defendants with the sealed exhibits to the Verified Complaint, attorney's eyes only, pursuant to an appropriate protective order, and, within five (5) days of receipt of same, each of the Stallion Defendants shall return any copies of the SDS documents contained in the sealed exhibits to SDS, and provide a certification that they will not use or disclose the SDS documents contained in the sealed exhibits, including to develop or customize Stallion's software systems.
2. Expedited Discovery:
  - a. The parties may serve requests for discovery, including document requests, interrogatories and requests for admissions within seven (7) days of the entry of this Order, which shall be responded to within twenty-one (21) days thereafter (subject to extension by agreement of the parties without the need to seek leave of Court); and
  - b. The parties may notice the deposition(s) of one or more opposing Parties or third-parties, upon ten (10) days' written notice.

~~3. Supplemental briefing, if any, shall be filed seven (7) days before the Hearing.~~

And **IT IS FURTHER ORDERED** that, by agreement of the Parties, service of the Summons and Complaint is deemed effective upon Defendants Stallion Express, LLC, Kravitz, and Sahadi as of **May 8, 2018**.



THE HONORABLE MADELINE COX ARLEO  
UNITED STATES DISTRICT JUDGE

\* The parties shall contact Judge  
Mannon to schedule a Rule  
16 conference. Discovery may proceed  
unaffected by agreement of parties.

\* Parties shall submit a  
status letter to the court by  
Aug 1, 2018, not to exceed 50  
pages.